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March 14, 2008

Via Facsimile (914) 390-4179

Chambers, Hon. Stephen C. Robinson  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

## MEMO ENDORSED

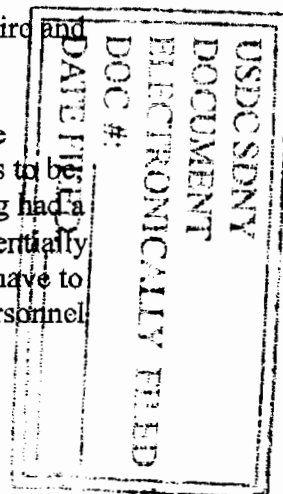
**Re: Nicole Ramos v. Piller, Inc.**  
Civil Action No. 07-CV-4047  
Our file no. 3007.017

Dear Judge Robinson:

I am writing on the consent of all parties to request a sixty (60) day extension (i.e. to June 25, 2008) of the discovery deadline in the above referenced matter. It took much longer than originally anticipated for our firm and our client, Piller, Inc., to gather the information and documents necessary to respond to the plaintiff's discovery demands. The most significant factor in the delay was that our client was forced to acquire and install a software system to enable it to search its e-mail archives for relevant correspondence for the time period at issue in this case (approximately four months). Given that that only alternative was to restore Piller's e-mail from tape back-up for the entire company for the period in question (which would have been prohibitively expensive), our client had little choice but to pay more than \$2,500 to acquire and install the software system.

The procurement and installation process took significant time, and even with the software system installed, searching for relevant correspondence has been, and continues to be, very time consuming. For example, one of the individuals whose e-mail we are searching had a habit of regularly cleaning out their mailbox. As a result, Piller's personnel have to sequentially import tapes for each day and restore the e-mail (at about one hour per tape). They then have to sift through and read all the e-mail for those that may be relevant to this case. Piller's personnel

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Page 2

March 14, 2008

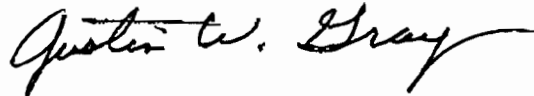
have been working on this for many weeks now, but are still in the process of searching. I have been told that it will still be a few weeks until the search can be completed.

We had held up serving our discovery responses in the hope of having the e-mail search complete, but altered course once we learned that it would still be a few more weeks. Therefore, we have served Piller's responses to the plaintiff's interrogatories, as well as produced documents responsive to the plaintiff's demands (which includes all relevant e-mail that we have recovered to date). As soon as Piller completes the search of its e-mail archives in a few weeks, we will supplement our response as necessary.

We believe that depositions can be scheduled and completed in a relatively short time period thereafter, and therefore respectfully request that the discovery deadline in this matter be extended to June 25, 2008. Thank you very much for your consideration of this request.

Very truly yours,

ISEMAN, CUNNINGHAM, RIESTER & HYDE, LLP

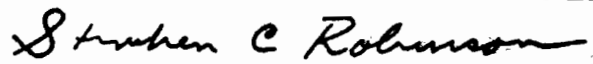


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cc: Helen G. Ullrich, Esq., Attorneys for Plaintiff (Via Facsimile (845) 469-5904)

APPLICATION GRANTED



HON. STEPHEN C. ROBINSON

3/17/08